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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FLAVIO MORENO,

Plaintiff,

v.

ROMEO ARANAS, et al.,

Defendants

Case No. 3:19-cv-00275-MMD-WGC

**ORDER GRANTING
MOTION FOR EXTENSION OF STAY TO
SEPTEMBER 18, 2020**

Defendants, by through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Meredith N. Beresford, Deputy Attorney General, hereby files this Motion for Extension of Stay to September 18, 2020. This motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, all papers and pleadings on file in this action, and is filed contemporaneously with the 90-day Stay Report.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request an extension of the 90-day stay to September 18, 2020 in order to file the Stipulation for Dismissal and for Judicial Economy. On September 1, 2020, parties participated in an Early Mediation Conference where an out-of-court settlement was reached. Counsel for Defendants sent the Stipulation for Dismissal and Settlement Agreement to Plaintiff on September 1, 2020. The deadline for which to file the Stipulation for Dismissal is September 18, 2020. Defendants

1 request the stay be continued through that date for Judicial Economy purposes as well as to allow time
2 to file the documents required to complete the settlement.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:
4 When an act may or must be done within a specified time, the court may, for good cause, extend the
5 time: (A) with or without motion or notice if the court acts, or if a request is made, before the original
6 time or its extension expires; or (B) on motion made after the time has expired if the party failed to act
7 because of excusable neglect.

8 For these reasons, Defendants respectfully request an extension of stay, with a new deadline to
9 and including **September 18, 2020**.

10 DATED this 2nd day of September, 2020.

11 AARON D. FORD
12 Attorney General

13 By: /s/ Meredith N. Beresford
14 MEREDITH N. BERESFORD, Bar No. 13308
15 Deputy Attorney General

Attorneys for Defendants

16 **IT IS SO ORDERED.**


17 BY: William G. Cobb
18 U.S. MAGISTRATE JUDGE

19 DATED: September 3, 2020
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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 2nd day of September, 2020, I caused to be served a copy of the foregoing, **MOTION FOR EXTENTION OF STAY TO SEPTEMBER 18, 2020**, by U.S. District Court CM/ECF Electronic Filing on:

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An employee of the